

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,
et al.,

Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS
(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO ELECTRIC POWER AUTHORITY,

Debtor.

PROMESA
Title III

No. 17 BK 04780

**INFORMATIVE MOTION OF ASSURED GUARANTY CORP.
AND ASSURED GUARANTY MUNICIPAL CORP.
REGARDING AUGUST 9-10, 2017 OMNIBUS HEARING**

Assured Guaranty Corp. and Assured Guaranty Municipal Corp. (f/k/a/ Financial Security Assurance Inc.) (together, “Assured”) hereby submit this informative motion in compliance with the Court’s *Order Regarding Procedures For Attendance, Participation And*

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); and Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686).

Observation Of August 9-10, 2017, Omnibus Hearing (No. 17-BK-3283-LTS, ECF No. 837, No. 17-BK-4780-LTS, ECF No. 159), and respectfully states as follows:

1. Ingrid Bagby, Ellen M. Halstead and Thomas J. Curtin of Cadwalader, Wickersham & Taft LLP will appear on behalf of Assured at the August 9-10, 2017 omnibus hearing regarding the following motions and objections:

- *Motion of Ad Hoc Group of PREPA Bondholders, National Public Finance Guarantee Corporation, Assured Guaranty Corp., Assured Guaranty Municipal Corp., and Syncora Guarantee Inc. for Relief from the Automatic Stay to Allow Movants to Enforce Their Statutory Right to Have a Receiver Appointed* (No. 17-BK-4780-LTS, ECF No. 74).
- *Motion of the Ad Hoc Group of General Obligation Bondholders to Reconstitute the Official Committee of Unsecured Creditors pursuant to 11 U.S.C. §§ 105(a) and 1102(a)(4)* (No. 17-BK-3283-LTS, ECF No. 694) and *Joinder of Assured Guaranty Corp. and Assured Guaranty Municipal Corp. to the Motion of the Ad Hoc Group of General Obligation Bondholders to Reconstitute the Official Committee of Unsecured Creditors Pursuant to 11 U.S.C. §§ 105(a) and 1102(a)(4)* (No. 17-BK-3283-LTS, ECF No. 811).
- *Motion of Official Committee of Unsecured Creditors for Leave to Intervene Under Bankruptcy Rule 7024* (Adv. Proc. No. 17-125-LTS, ECF No. 37) and *Opposition of National Public Finance Guarantee Corporation, Assured Guaranty Corp., and Assured Guaranty Municipal Corp. to the Committee of Unsecured Creditors' Motion for Leave to Intervene* (Adv. Proc. No. 17-125-LTS, ECF No. 39).
- *Motion of COFINA Senior Bondholders' Coalition for (I) Modification of the Order Granting Interpleader, or (II) in the Alternative, Clarification of the Interpleader Memorandum Opinion and Intervention Denial Order* (Adv. Proc. No. 17-133-LTS, ECF No. 290) and *Opposition of Defendant Assured Guaranty Municipal Corp. to Motion of COFINA Senior Bondholders' Coalition for (I) Modification of the Order Granting Interpleader, or (II) in the Alternative, Clarification of the Interpleader Memorandum Opinion and Intervention Denial Order* (Adv. Proc. No. 17-133-LTS, ECF No. 295).

2. Ms. Bagby, Ms. Halstead and Mr. Curtin also appear to respond to, as appropriate, any statements made by any party in connection with the above-captioned Title III cases or any adversary proceedings currently pending in the above-captioned Title III cases.

3. Ms. Bagby, Ms. Halstead and Mr. Curtin will appear in the San Juan courtroom of the U.S. District Court for the District of Puerto Rico.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 7th day of August, 2017.

CASELLAS ALCOVER & BURGOS P.S.C.

CADWALADER, WICKERSHAM & TAFT
LLP

By: /s/ Heriberto Burgos Pérez

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By: /s/ Ellen M. Halstead

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*Admitted *pro hac vice* in Nos. 17-BK-
03283-LTS, 17-BK-04780-LTS, Adv. Proc.
Nos. 17-125-LTS, 17-133-LTS

**Admitted *pro hac vice* in Nos. 17-BK-
03283-LTS, 17-BK-04780-LTS

*Counsel for Assured Guaranty Corp. and
Assured Guaranty Municipal Corp.*

CERTIFICATE OF LOCAL COUNSEL AND OF SERVICE

I hereby that I filed this document electronically with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to all parties of record in the captioned case.

At San Juan, Puerto Rico, this 7th day of August, 2017.

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